

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA**

JAMF SOFTWARE, LLC, a corporation

Plaintiff,

vs.

PRAKASH MAHARAJ, an individual and
KANDJI, INC., a corporation.

Defendants.

Case No.

**NOTICE OF HEARING ON
PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER**

TO: Defendant Prakash Maharaj & Defendant Kandji, Inc.

PLEASE TAKE NOTICE that at a date and time to be determined pursuant to Local Rule 7.1, before a judge to be determined in the United States Courthouse, 300 South Fourth Street, Minneapolis, Minnesota, Plaintiff Jamf Software, LLC ("Plaintiff" or "Jamf") will bring on for hearing its motion for temporary restraining order: (a) requiring Defendants Prakash Maharaj ("Maharaj") and Kandji, Inc. ("Kandji") (collectively, "Defendants"), to return and disgorge all Jamf documents and information in their possession and that restrains and enjoins Defendants from continuing to use any documents or information misappropriated from Jamf; (b) requiring Defendant Maharaj to comply with his post-relationship contractual obligations to Jamf, including, but not limited to, an injunction prohibiting Defendant Maharaj from soliciting Jamf clients while in possession of Jamf's confidential and proprietary trade secrets information in violation of his Service Agreement and Non-Disclosure Agreement and prohibiting Defendant Kandji from interfering with Defendant Maharaj's obligations to Jamf; (c) compelling Defendants to produce all work computers, cellular phones, USB drives, thumb drives, disks, external hard drives, or any other electronic storage devices or systems which Defendants have utilized at any from June 2023 to the present (the "Electronic Media"); (d) compelling Defendants to produce their Electronic

Media to a computer forensics expert identified by Jamf to conduct an appropriate search and forensic review of those devices; (e) ordering that discovery immediately commence and be conducted on an expedited basis; (f) requiring Defendants to account for and return all Jamf trade secrets and confidential information in their possession, custody, or control, and to certify that they have returned to Jamf all of Jamf's trade secrets and confidential information in their possession, custody, or control; (g) requiring Defendants to provide an accounting of all revenues and profits derived from, facilitated by, or obtained by each of them, directly or indirectly, as a result of Defendants' misappropriation of Jamf's trade secrets and confidential information; and (h) any other such relief as this Court deems just and proper.

This motion is made pursuant to Federal Rule of Civil Procedure 65(b) and based upon the memorandum of law and accompanying evidence filed herewith, any further evidence and argument to be presented at or before the hearing, and all of the files, records, and proceedings herein.

Dated: August 17, 2023.

/s/Andrew D. Moran

Andrew D. Moran (0392381)
Larkin Hoffman Daly & Lindgren Ltd.
8300 Norman Center Drive
Suite 1000
Minneapolis, Minnesota 55437-1060
(952) 835-3800
amoran@larkinhoffman.com
Attorneys for Jamf Software, LLC

Brodie D. Erwin
Pro Hac Vice Application to be Filed
KILPATRICK TOWNSEND & STOCKTON LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
Telephone: (919) 420-1818
Fax: (919) 710-8226

Andrew T. Williamson
Pro Hac Vice Application to be Filed
KILPATRICK TOWNSEND & STOCKTON LLP
1100 Peachtree Street N.E., Suite 2800
Atlanta, GA 30309
Telephone: (404) 815-6522
Fax: (404) 815-6555